

UNITED STATES DISTRICT COURT
District of New York

UNITED STATES OF AMERICA,) Case No: 21-MJ-50
Plaintiff,)
versus)
Kaveh L. Afrasiabi,)
Defendant.)

**DEFENDANT'S MOTION FOR THE IMMEDIATE DISMISSAL OF COMPLAINT BASED ON
FAKE EMAILS ATTACHED TO HIM**

Defendant Kaveh Afrasiabi, pro se, moves the Honorable Court to dismiss the complaint against him on the ground of government misconduct reflected in the various emails attributed to him in the Complaint, none of which were written by the Defendant. The Complaint relies extensively on the Defendant's purported emails in order to establish its allegation of Defendant writing propaganda articles and books to advance Iran's interests, yet instead of citing any such writing, the Complaint uses the purported emails as convenient substitutes, aimed at defaming the Defendant and portraying him as anti-American.

This is Orwellianism through and through and ought not to be tolerated by the Honorable Court. Defendant prays the court to hold an evidentiary hearing immediately to ascertain the Defendant's allegations – that he has been the victim of a gross government misconduct, incredibly similar to what the Defendant endured with Harvard police 25 years ago. Every single email in the Complaint can be competently shown to be at great variance with the Defendant's style and content of his writings. Should the Court be satisfied that the Complaint against him, likely presented to the Grand Jury, is tainted with lies and outright distortions, then the interest of justice dictates that the case be summarily dismissed.

Kaveh L. Afrasiabi. Pro Se

Certificate of Copy: A true copy of this Motion has been served on the Plaintiff on this date, January 31, 2021, under the pains and penalties of perjury.

Kaveh Afrasiabi